FFR 2 4 2016

William L. Zawila
ATTORNEY AT LAW

FCC Mail Room

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February 20, 2016

Marlene H. Dortch, Secretary FCC 445 12th Street. S.W. Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: EB Docket #03-152

Enclosed Joinder in Motion for Protective Order (CFR §1.313)
Request for Conformed Copy of Caption Page

Secretary:

Enclosed for filing in the above-referenced matter is an original and six (6) copies of Joinder in Motion for Protective Order (CFR §1.313).

Also enclosed is a copy of the caption page from the Joinder to be conformed and returned to this office in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter.

WLZ/jc encls very truly yours,

William L. Zawila

Attorney for the Estate of Linda Ware, Cynthia Ramage, Executor, the Estate of H.L. Charles, Robert Willing, Executor, Avenal Educational Services, Inc., Central Valley Educational Services, Inc., and William L. Zawila

No. of Copies rec'd 0+6

Before the Federal Communications Commission Washington, DC 20554

FEB 2 4 2016

FCC Mail Room

In the Matter of) EB Docket No. 03-152
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LINDA WARE d/b/a LINDSAY) Facility ID No. 37725
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Licensee of FM Station KZPO,)
Lindsay, California)

To: Marlene H. Dortch, Secretary, FCC Attn: Chief Administrative Law Judge Richard L. Sippel

JOINDER IN MOTION FOR PROTECTIVE ORDER (47 C.F.R. §1.313)

The Estate of Linda Ware, Cynthia Ramage, Executor, the Estate of H.L. Charles, Robert Willing, Executor, Avenal Educational Services, Inc., Central Valley Educational Services, Inc.,

and William L. Zawila hereby join as "Movants", by their attorney, in the Motion for Protective Order (C.F.R. §1.313) filed in this proceeding on or about February 8, 2016, by attorney Michael Couzens.

The legal issues, points, authorities, and argument expressed by Mr. Couzens apply with equal force and effect to the parties to this Joinder named herein-above.

While the text of the said Motion focuses on discovery served on Avenal Educational Services, Inc. and Central Valley Educational Services, Inc., the legal issues, the points of law and authorities cited, and the argument expressed by Mr. Couzens are equally applicable to discovery served on the Estate of Linda Ware, Cynthia Ramage, Executor, the Estate of H.L. Charles, Robert Willing, Executor, and William L. Zawila.

The parties to this Joinder named hereinabove join in the request to have a protective order issued barring all discovery against the Movants until the issues of ten-year cutoff and commercial (non-reserved) band are ruled upon, either by the presiding officer or by an allowed appeal to the full Commission.

12600 Brookhurst Street - #105 Garden Grove, CA 92840 (714)636-5040-Telephone (714)636-5042-FAX

William L. Zawila

Respectfully submitted,

Attorney for the Estate of Linda Ware, Cynthia Ramage, Executor, the Estate of H.L. Charles, Robert Willing, Executor, Avenal Educational Services, Inc., Central Valley Educational Services, Inc., and William L. Zawila

2-20-16

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Joinder in Motion for Protective Order (47 C.F.R. §1.313)

was served on the following by U.S. First Class Mail, postage prepaid, on 2-20-16:

Chief Administrative Law Judge
Richard L. Sippel
FCC
445 12th Street, S.W. - Room 1-C768
Washington, D.C. 20554

Pamela S. Kane, Esquire Investigations and Hearings Division Enforcement Bureau FCC 445 12th Street. S.W. - Room 4-C366 Washington, D.C. 20554

Michael Couzens 6536 Telegraph Avenue -Suite B201 Oakland, CA 94609

William T. Zawila